

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION**

IN RE:

**J. C. PENNEY DIRECT MARKETING
SERVICES, LLC., *et al.*,¹**

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Chapter 11

Case No. 20-20184

**(Jointly Administered)
(Formerly Jointly Administered
under J.C. Penney Company,
Inc., 20-20182)**

IN RE:

**Professional Fee Matters Concerning
The Jackson Walker Law Firm**

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Case No. 23-00645 (EVR)

**OLD COPPER COMPANY, INC.’S JOINDER OF THE UNITED STATES
TRUSTEE’S AMENDED AND SUPPLEMENTAL MOTION FOR (1) RELIEF
FROM JUDGMENT PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE
60(B)(6) AND FEDERAL RULE OF BANKRUPTCY PROCEDURE 9024
APPROVING THE RETENTION AND COMPENSATION APPLICATIONS OF
JACKSON WALKER LLP, (2) SANCTIONS, AND (3) RELATED RELIEF**

The Old Copper Company, Inc. f/k/a J. C. Penney Company, Inc., and Copper Sub Corporation, Inc. f/k/a J. C. Penney Corporation, Inc., as Wind Down Debtor in J. C. Penney Direct Marketing Services, LLC (“Old Copper Company”) joins and adopts the *United States Trustee’s Amended and Supplemental Motion for (1) Relief from Judgment Pursuant to Federal Rule of Civil Procedure 60(b)(6) and Federal Rule of Bankruptcy Procedure 9035 Approving the Retention and Compensation Applications of Jackson Walker LLP, (2) Sanctions, and (3) Related Relief* [Dkt. 1351] (the “UST Motion”).

¹ “JCP” shall include the debtors in the following cases: 20-20182, J. C. Penney Company, Inc.; 20-20198, Future Source LLC; 20-20183, J. C. Penney Corporation, Inc.; 20-20184, J. C. Penney Direct Marketing Services LLC; 20-20185, J. C. Penney Export Merchandising Corporation; 20-20186, J. C. Penney International, Inc.; 20-20181, J. C. Penney Properties, LLC; 20-20187, J. C. Penney Purchasing Corporation; 20-20188, JCP Construction Services, Inc.; 20-20189, JCP Media, Inc.; 20-20190, JCP New Jersey, LLC; 20-20191, JCP Procurement, Inc.; 20-20192, JCP Real Estate Holdings, LLC; 20-20193, JCP Realty, LLC; 20-20194, JCP Telecom Systems, Inc.; 20-20195, JCPenney Puerto Rico, Inc.; 20-20196, JCPenney Services, LLC; 20-20197, jcpSSC, Inc. (collectively, the “JCP Bankruptcy Cases”).

As set forth in the Notice of Indispensable Party Status [Dkt. 1413] filed in the post-confirmation JCP Bankruptcy Case No. 20-20184, by virtue of the Amended Order Approving the Amended Disclosure Statement for, and Approving the Amended Joint Chapter 11 Plan of Reorganization of J.C. Penney Company, Inc, and its Debtor Affiliates [Docket No. 1290] in Case no. 20-20182, Old Copper Company, by and through its Plan Administrators, is vested with all causes of action of the bankruptcy estates, whether in existence at the time or arising afterwards.

Through this Joinder, Old Copper Company joins and adopts the relief sought in the UST Motion, including the allegations, arguments, and pleadings made and/or filed by the U.S. Trustee in support thereof, to the extent of seeking (a) to vacate the orders approving the retention and compensation of Jackson Walker LLP as Debtors' counsel, and (b) disgorgement of fees and expenses paid to Jackson Walker in the JCP Bankruptcy Cases.

Dated: January 15, 2025

Respectfully submitted,

STREUSAND, LANDON, OZBURN
& LEMMON LLP

By: /s/ Stephen W. Lemmon
Stephen W. Lemmon
State Bar No. 12194500
lemmon@slollp.com
1801 S. MoPac Expressway, Suite 320
Austin, Texas 78746
(512) 236-9900; (512) 236-9904 (Fax)

**ATTORNEY FOR OLD COPPER
COMPANY, INC.**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing instrument has been served on this 15th day of January 2025 upon all parties registered to receive such electronic notices in this case via this Court's ECF Notification system.

/s/ Stephen W. Lemmon

Stephen W. Lemmon